

Hess, Alana

From: Langford, Mallory <mlangford@aeci.org>
Sent: Friday, August 17, 2018 2:51 PM
To: Hess, Alana
Cc: Henry, Tadd; Pinkerton, Blake; Wells, Jay; Farmer, Kevin
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)
Attachments: Phase II NOx Compliance Plan.pdf; Phase II NOx Averaging Plan.pdf; CAIR Permit Application.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Ms. Hess,

Please review the responses to your questions below regarding the Title V renewal for New Madrid Power Plant.

1. For MATS does New Madrid use just one set of sorbent traps to demonstrate compliance with the applicable Hg emission limit? I.e. is New Madrid complying with §63.10000(c)(1)(vi)(A) or §63.10000(c)(1)(vi)(B)? New Madrid complies with 63.10000(c)(1)(vi)(B), where only one sorbent trap sampling system is used to monitor all periods of operation, including startup and shutdown.
2. According to page SB-4 of Operating Permit OP2010-116B, the Barge River Pumps are used to pump cooling water during low river flow. How does New Madrid pump their cooling water during normal/high river flow? Each unit has its own intake structure located in the river. During times of normal/high river flow, the intake structures are sufficiently submerged, and naturally feed the electric circulating water pumps with adequate volume of water. During times of low river flow, the intake structures are not fully submerged, and therefore require the assistance of the diesel barge pumps to force additional water into the intake structures to provide the adequate volume of water.
3. MoEIS includes an EP-10 Internal Combustion Engines Industrial – Large Bore Engine Diesel Fuel Fired which is labelled as active for the installation; however, I cannot located this engine(s) anywhere in the previous operating permit or application. Please indicate if this is still an active emission source. If it is please provide the number of engines, size of each engine, and model year of each engine. EP-10 Internal Combustion Engine originated from a 2009 temporary need for diesel powered air compressor to run Unit 2 soot blowers while the permanent air compressors were being repaired. The point can be marked as inactive at this time for MOEIS purposes.
4. Please submit your Phase II NOx Compliance Plan (and Phase II NOx Averaging Plan if applicable) for Boilers 1 and 2. Refer to attachments.
5. Please submit a CAIR Permit application. Although rescinded on the federal level, the CAIR program remains in our State Implementation Plan (SIP); therefore, technically we still have to have a CAIR permit in the Part 70 as CAIR is technically still an applicable requirement. We are working on removing CAIR requirements from our SIP. Refer to attachments.

Thanks, and please let me know if you need further clarification.

Mallory Langford
Environmental Analyst
2814 S. Golden Ave.
Springfield, MO 65807

(417) 371-5237 Office

(816) 787-7431 Cell
mlangford@aeci.org



From: Hess, Alana <Alana.Hess@dnr.mo.gov>
Sent: Friday, August 03, 2018 2:54 PM
To: Pinkerton, Blake <BPinkerton@aeci.org>
Cc: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>; Farmer, Kevin <KFarmer@aeci.org>
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

****EXTERNAL E-MAIL** Think before clicking links or attachments.**

Blake,

I am still working on New Madrid's operating permit. I wondered if you could answer a few questions for me:

1. For MATS does New Madrid use just one set of sorbent traps to demonstrate compliance with the applicable Hg emission limit? I.e. is New Madrid complying with §63.10000(c)(1)(vi)(A) or §63.10000(c)(1)(vi)(B)?
2. According to page SB-4 of Operating Permit OP2010-116B, the Barge River Pumps are used to pump cooling water during low river flow. How does New Madrid pump their cooling water during normal/high river flow?
3. MoEIS includes an EP-10 Internal Combustion Engines Industrial – Large Bore Engine Diesel Fuel Fired which is labelled as active for the installation; however, I cannot located this engine(s) anywhere in the previous operating permit or application. Please indicate if this is still an active emission source. If it is please provide the number of engines, size of each engine, and model year of each engine.
4. Please submit your Phase II NOx Compliance Plan (and Phase II NOx Averaging Plan if applicable) for Boilers 1 and 2.
5. Please submit a CAIR Permit application. Although rescinded on the federal level, the CAIR program remains in our State Implementation Plan (SIP); therefore, technically we still have to have a CAIR permit in the Part 70 as CAIR is technically still an applicable requirement. We are working on removing CAIR requirements from our SIP.

Please try to provide this information by August 20, 2018.

Thanks,

Alana L. Hess, P.E.
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102
(573) 526-0189

We'd like your feedback on the service you received from the Missouri Department of Natural Resources. Please consider taking a few minutes to complete the department's Customer Satisfaction Survey at https://secure-web.cisco.com/1sMQ2bADQHJaHmGZRHB-IdOqXVJZhmBQFrLHuOhn3OGDn_a_0-4DCMXZ2fhlt0G6VN_GCHy34k-wYmejVfAOEs8vjiPXhV7-

K3rCCG6JR0VyWBB5qVjnVDWKLJr5K8qAlqskrDYQsMKqllBTnl7BaJqGNlzXm7crWDrFOALXnhkvpftEKGxoK80IKL6zQh21a66U-Ns3gP05XTbHUd8ov5WIWqqYYXrtf_rXKEU-U-XMg3qE6vCjw0tvaAbW5CDe9e7PR0QT-c8rxjnxmD6j-w/https%3A%2F%2Fwww.surveymonkey.com%2Fr%2FMoDNRsurvey. Thank you.

From: Pinkerton, Blake <BPinkerton@aeci.org>
Sent: Monday, April 10, 2017 4:27 PM
To: Hess, Alana <Alana.Hess@dnr.mo.gov>
Cc: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>; Farmer, Kevin <KFarmer@aeci.org>
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Ms. Hess,

Please see the responses to your questions below regarding our New Madrid Power Plant.

Please provide answers to the following questions:

1. Are the two 2.4 MMBtu/hr fuel oil heaters in No Construction Permit Required Determination 2016-01-004 (2016-01-004.pdf) EU0290 and EU0300 Tioga Heaters or are these different heaters? **The Tioga Heaters referenced as EU0290 and EU0300 are hard piped stationary units used at the crusher house. The units referenced in the No Construction Permit Required Determination are the same type/size, but skid mounted (portable) and rented for short term use during the winter months.**
2. No Construction Permit Required Determination 2012-06-072 states that you planned to use 14 275 HP barge pumps instead of EP-09 8 300 HP barge pumps and EP-13 2 345 HP barge pumps. Did this change occur? **The change did not occur. Still have the 8 as EP-09 and 2 as EP-13.**
3. How many acres are active at any given time in the landfill? **Each cell is 25 acres. Only 1 cell will be "active" at a time. Currently using Phase L- Cell 1, will switch to Phase III – Cell 2 when full.**
4. Construction Permit 092006-004 states that Boilers 1 and 2 have an MHDR of 7,150 MMBtu/hr, EPA's Air Markets Program indicates that Boiler 1 has an MHDR of 6,728 MMBtu/hr and Boiler 2 has an MHDR of 6,985 MMBtu/hr; however, the previous operating permit and your application state the MHDRs are only 6,340 MMBtu/hr. Please explain these discrepancies. EPA generally requires us to use the MHDR in the Air Markets Program unless sufficient justification can be provided for an increase/decrease in the MHDR... **I do not have the historical data on this but the higher number may have been used to represent the higher BTU Illinois coal before the switch to PRB. We are not opposed to using the numbers listed in the Air Markets Program but what would the implications be for using those numbers if it is found that the 6,340 MMBtu/hr is a better number?**
5. Would you please send me a copy of New Madrid's MATS initial NOC? **I have attached a copy to this email.**

From: Hess, Alana [<mailto:Alana.Hess@dnr.mo.gov>]
Sent: Wednesday, March 29, 2017 3:01 PM
To: Wells, Jay <JWells@aeci.org>; Henry, Tadd <thenry@aeci.org>
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Mr. Wells,

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3. How many acres are active at any given time in the landfill?

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Alana L. Hess, PE
Environmental Engineer III
Missouri Department of Natural Resources

Phone: (573) 526-0189
Fax: (573) 751-2706
E-mail: alana.hess@dnr.mo.gov

Mailing Address:
Air Pollution Control Program – Permits Section
Attn: Alana Hess
P.O. Box 176
Jefferson City, MO 65102

From: Hess, Alana
Sent: Tuesday, March 28, 2017 10:41 AM
To: 'jwells@aeci.org'; thenry@aeci.org
Subject: 2015-04-093 New Madrid Power Plant (143-0004)

Mr. Wells,

My name is Alana Hess. I am an Environmental Engineer with the Missouri Department of Natural Resources' Air Pollution Control Program. I have been assigned to review the Part 70 operating permit renewal application, Project 2015-04-093, for New Madrid Power Plant (143-0004).

I may have questions for you throughout my review and drafting of the permit. Please respond to all questions within 15 days. An extension is available upon request.

I look forward to working with you.

Thanks,

Alana L. Hess, PE
Environmental Engineer III
Missouri Department of Natural Resources

Phone: (573) 526-0189
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E-mail: alana.hess@dnr.mo.gov

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Jefferson City, MO 65102

Hess, Alana

From: Hess, Alana
Sent: Friday, August 3, 2018 2:54 PM
To: 'Pinkerton, Blake'
Cc: Wells, Jay; Henry, Tadd; Farmer, Kevin
Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

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Air Pollution Control Program
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Jefferson City, MO 65102

Hess, Alana

From: EIQOnWeb@dnr.mo.gov
Sent: Thursday, August 2, 2018 1:03 PM
To: Hess, Alana
Subject: EIQ Report 2015 NEW MADRID POWER PLANT MARSTON
143-0004.
Attachments: eiq.pdf

Your EIQ report was generated on Thu Aug 02 13:02:51 CDT 2018

Hess, Alana

From: EIQOnWeb@dnr.mo.gov
Sent: Thursday, August 2, 2018 1:03 PM
To: Hess, Alana
Subject: EIQ Report 2016 NEW MADRID POWER PLANT MARSTON
143-0004.
Attachments: eiq.pdf

Your EIQ report was generated on Thu Aug 02 13:02:31 CDT 2018

Hess, Alana

From: EIQOnWeb@dnr.mo.gov
Sent: Thursday, August 2, 2018 1:02 PM
To: Hess, Alana
Subject: EIQ Report 2017 NEW MADRID POWER PLANT MARSTON
143-0004.
Attachments: eiq.pdf

Your EIQ report was generated on Thu Aug 02 13:02:10 CDT 2018